The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANDRES A. MUNT-LOVELL NICHOLAS P. MUNT-LOVELL Plaintiff, v. THE INTERNATIONAL CAT ASSOCIATION, et al. Defendants.	Case No. 2:25-cv-01665-RAJ PLAINTIFFS' NOTICE OF INTENT TO FILE FIRST AMENDED COMPLAINT

Plaintiffs Andres A. Munt-Lovell and Nicholas P. Munt-Lovell respectfully notify the Court that they intend to file a First Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(1) and (2) promptly following resolution of a pending jurisdictional matter in a related California state action.

I. Procedural Status

A brief summary of the case's procedural statis is set forth below:

- Plaintiffs filed the original Complaint on October 28, 2025.
- Summons have been requested but have not yet issued.
- No Defendant has been served and no Defendant has appeared.
- No Rule 26(f) conference has occurred, and discovery has not begun.

Accordingly, Plaintiffs retain the right to amend their pleading without leave under Rule 15(a)(1)(A).

II. Related California Proceeding

On October 16, 2025, Defendants' counsel in a separate action, Fat Pet Awards & TICA v. SeaCats, Munt, and Lovell, Orange County Superior Court Case No. 30-2025-01505922, attempted service of a California complaint on the Plaintiffs.

Plaintiffs filed a Motion to Quash Service of Summons in that matter on November 10, 2025. The Superior Court calendared the motion for February 27, 2026, the earliest available date. Plaintiffs have requested that the California motion be decided on the papers without a hearing.

III. Basis for Forthcoming Amendment

Plaintiffs' anticipated First Amended Complaint will include:

- Additional facts arising from Defendants' filing of the California action while this federal action was pending;
- Allegations relevant to Defendants' use of the California proceeding as retaliatory litigation and abuse of process, including naming a dissolved Washington nonprofit entity ("SeaCats") despite TICA having revoked its charter in 2024;
- Clarifications required by Plaintiffs' ongoing review of documents and communications obtained after filing the original complaint.

Plaintiffs expect the amended complaint to streamline claims, incorporate additional relevant defendants, and present all facts in a manner consistent with Twombly/Iqbal and this Court's pleading standards.

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IV. Timing

Plaintiffs intend to file the First Amended Complaint immediately upon resolution of the Motion to Quash in the California action, or sooner upon further order of this Court. This schedule preserves judicial economy, avoids parallel adjudication of overlapping factual matters, and ensures that Defendants are served with the operative and complete amended pleading.

V. Conclusion

Plaintiffs respectfully submit this Notice to ensure the Court is apprised of the procedural status and to confirm that no Defendant has yet been served with process or appeared in this action.

DATED: November 18, 2025, Renton, Washington

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